

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 17-mc-151 (LPS)

OI EUROPEAN GROUP B.V.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 19-mc-290 (LPS)

**SUPPLEMENTAL ADDITIONAL JUDGMENT SUMMARY BY OI EUROPEAN
GROUP B.V.**

Dated: March 13, 2024

MORGAN, LEWIS & BOCKIUS LLP

SEQUOR LAW, P.A.

Jody C. Barillare, Bar No. 5107
1201 N. Market Street, Suite 2201
Wilmington, DE 19801
Telephone: 302-574-3000
Facsimile: 302-574-3001
jody.barillare@morganlewis.com

Edward H. Davis, Jr.
Fernando J. Menendez
1111 Brickell Avenue, Suite 1250
Miami, FL 33131
Telephone: 305-372-8282
Facsimile: 305-372-8202
edavis@sequorlaw.com
fmenendez@sequorlaw.com

- and -

Jonathan M. Albano
Christopher L. Carter
One Federal Street
Boston MA 02110

Telephone: 617-341-7700

Facsimile: 617-341-7701

jonathan.albano@morganlewis.com

christopher.carter@morganlewis.com

Attorneys for Plaintiff, OI European Group B.V.

Plaintiff, judgment creditor and writ holder OI European Group B.V. (“OIEG”), submits this Supplemental Additional Judgment Summary in response to this Court’s Memorandum Order entered on October 11, 2023. *See* D. Del., Case No. 17-mc-151 (“Crystallex”), D.I. 738 (the “October 11 Order”).

SUMMARY OF COMPLETED STEPS

Set forth below is the status of OIEG’s efforts to complete the seven steps outlined in this Court’s July 27, 2023 Memorandum Order. *See Crystallex*, D.I. 646 (the “July 27 Order”). As of January 8, 2024, OIEG was designated as an Additional Judgment Creditor. *See Crystallex*, D.I. 838.

1. STEP 1 – “A creditor proves it is owed some debt by a Venezuela Party.”

Completed: March 10, 2015. OIEG obtained the OIEG Award against Venezuela on March 10, 2015. *See Crystallex*, D.I. 748 (the “OIEG First Summary”)¹ at pp. 1-2, Ex. 1; Ex. 2; Ex. 3.

2. STEP 2 – “The creditor enforces its award in a U.S. court and receives a judgment.”

Completed: May 21, 2019. The OIEG Award was recognized and confirmed as a U.S. judgment on May 21, 2019. *See* OIEG First Summary at p. 2, Ex. 4.

3. STEP 3 – “The creditor registers its judgment in the District of Delaware.”

Completed: November 4, 2019. OIEG registered its Judgment with this Court on November 1, 2019. *See* OIEG First Summary at p.2, Ex. 4.

4. STEP 4 – “The creditor moves in Delaware for a writ of attachment fieri facias (‘fi. fa’).”

¹ Capitalized but undefined terms used here shall be as defined in the OIEG First Summary.

Completed: February 19, 2021. OIEG filed a renewed motion for a writ of attachment *fi.*

fa. on February 19, 2021. *See* OIEG First Summary at p.2, Ex. 5.

5. STEP 5 – “The creditor obtains a writ of attachment *fi. fa.* which may be conditioned on subsequent events.”

Completed: March 23, 2023. On March 23, 2023, this Court approved OIEG’s motion for a writ of attachment on the PDVH Shares, after finding that PDVSA was Venezuela’s alter ego. *See* OIEG First Summary at p.3, Ex. 6; Ex. 7.

6. STEP 6 – “The Clerk issues to the United States Marshals Service (‘Marshals’) the writ of attachment *fi. fa.*”

Completed: March 8, 2024. On March 7, 2024, this Court entered the Writ Order. *See Crystallex*, D.I. 1036. Pursuant to the Writ Order, this Court held that the conditions to the issuance and service of OIEG’s writ of attachment against the PDVH Shares have been satisfied. *See id.* at 3. The Court further directed the Clerk to affix her original signature and seal on OIEG’s proposed writ of attachment. *Id.* On March 8, 2024, the Clerk issued OIEG’s writ to the United States Marshals Service (the “U.S. Marshal”), *see Exhibit 1*, with delivery to the U.S. Marshal to be made on March 27, 2024, in accordance with the procedures in the Writ Order.

7. STEP 7 – “The U.S. Marshals Service serves the creditor’s writ of attachment, perfecting the writ and attaching the shares of PDVH owned by PDVSA.”

Not Yet Completed.

CONCLUSION

As summarized above, OIEG has completed Step 1 through Step 6 and is positioned to satisfy Step 7 shortly after March 27, 2024, when OIEG will be permitted to deliver its writ to the U.S. Marshal for service on Robert Pincus, in his capacity as Special Master in *Crystallex*, and PDVH.

Dated: March 13, 2024

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Jody C. Barillare

Jody C. Barillare, Bar No. 5107
1201 N. Market Street, Suite 2201
Wilmington, DE 19801
Telephone: 302-574-3000
Facsimile: 302-574-3001
jody.barillare@morganlewis.com

- and -

Jonathan M. Albano (*pro hac vice*)
Christopher L. Carter (*pro hac vice*)
One Federal Street
Boston MA 02110
Telephone: 617-341-7700
Facsimile: 617-341-7701
jonathan.albano@morganlewis.com
christopher.carter@morganlewis.com

SEQUOR LAW, P.A.

Edward H. Davis, Jr. (*pro hac vice*)
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1111 Brickell Avenue, Suite 1250
Miami, FL 33131
Telephone: 305-372-8282
Facsimile: 305-372-8202
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